

FILED

AO91 (Rev. 12/03) Criminal Complaint

APR 27 2007

UNITED STATES DISTRICT COURT

WILLIAM B. GUTHRIE
Clerk, U.S. District CourtBy: Oklahoma Deputy Clerk

Eastern

DISTRICT OF

UNITED STATES OF AMERICA
V.
WILLIAM SCOTT KRAMER

CRIMINAL COMPLAINT

Case Number:

07 MJ - 065 - KEW

(Name and Address of Defendant)

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about 4/25/2007 in Cherokee County, in the Eastern District of Oklahoma defendant(s) did,

(Track Statutory Language of Offense)

Give False Information or Hoax

in violation of Title 18 United States Code, Section(s) 1038(a)(1).

I further state that I am a(n) Special Agent, ATF and that this complaint is based on the following facts:

Official Title

See attached Affidavit of Special Agent Carlos Sandoval, Bureau of Alcohol, Tobacco, Firearms and Explosives

Continued on the attached sheet and made a part of this complaint: ☒ Yes ☐ No

Signature of Complainant

Carlos Sandoval

Printed Name of Complainant

Sworn to before me and signed in my presence,

4/27/2007

Date

at Muskogee, Oklahoma

City

State

KIMBERLY E. WEST

Name of Judge

Magistrate Judge

Title of Judge


Signature of Judge

AFFIDAVIT

I, Carlos Sandoval, affiant being first duly sworn, depose and state that:

I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), United States Department of Justice, and have been so employed for sixteen (16) years. I was previously employed by the Arlington, Texas, Police Department as a Police Officer for approximately four (4) years.

I graduated from the Federal Law Enforcement Training Center and the ATF National Academy in Glynco, Georgia. As a result of my training and experience as an ATF Special Agent, I am familiar with certain federal criminal laws and know that it is a violation of Title 18, United States Code, Section 1038, to commit false information and hoaxes.

This affidavit is made in support of a Complaint and Arrest Warrant for **William Scott KRAMER** for a violation of Title 18, United States Code, Section 1038(a)(1) – False Information and Hoaxes. This statute states:

(1) IN GENERAL- Whoever engages in any conduct with intent to convey false or misleading information under circumstances where such information may reasonably be believed and where such information indicates that an activity has taken, is taking, or will take place that would constitute a violation of chapter 2, 10, 11B, 39, 40, 44, 111, or 113B of this title, section 236 of the Atomic Energy Act of 1954 (42 U.S.C. 2284),

Further, the Affiant states as follows:

1. On April 25, 2007, at approximately 12:00 pm, Alcohol, Tobacco, Firearms and Explosives (ATF) Agent Curt Collins (COLLINS) received a telephone call from ATF Agent Carlos Sandoval advising him of a potential explosive device located on the Northeastern State University, University Center (NSU). The Oklahoma Highway Patrol (OHP) Bomb Squad responded as well. COLLINS then telephonically spoke with OHP Bomb Squad member Buddy Hamilton (HAMILTON) who advised he was on the scene, and he suspected the device was a hoax but was not certain. HAMILTON advised a note referencing a bomb was located a short time prior to the device being located.

2. At approximately 12:40 pm, COLLINS arrived at the University Center on campus and met with NSU Police Department Chief Clint Vernon (VERNON). VERNON advised the note left by the suspect read "I am going to blow this place up and kill everyone in it. I mean it."

3. After completing an examination of the suspected device, HAMILTON declared the device a hoax. The hoax device was constructed from a white colored Styrofoam cup turned upside down with two wires protruding from the cup.

4. NSU Police Detective Shirley Bowlin (BOWLIN) examined the video of the bomb threat incident at the University Center. BOWLIN observed only five people in the area where the device was found, during the time when Lt. Bennie Gladd (GLADD) and Chief VERNON conducted their first and second sweep of the area.

5. The only person of interest observed on the surveillance video were two workers whom are believed to be employed by Sodexo (food service for NSU). The behavior of the employees in the area, near where the device was located, was the most suspicious. They appeared to peek around the corner, step out, look around, and quickly duck back into the area.

6. BOWLIN went to the University Center accompanied by Officer Daniel Morgan (MORGAN) and searched the area where the suspected individuals worked. He walked through the large dishwashing area looking for the same materials used in the device. The officers located cups in the employee area, napkins and a cup full of pencils and pens.

7. In a storage closet adjacent to the dishwashing area, Officer MORGAN found an object with several colored wires sticking from it (Vanguard Wash Max-Dishwasher soap dispenser). The wires appeared to be of the same type and size as used in the hoax device. There was yellow discoloration on the white wire that appears on the device found, very similar coloration and wire color (silver colored wire which turns a copper color when raked with a knife blade). Photos were taken of the aforementioned wires. These photos were compared to other photos of the hoax device. The photos depict what appears to be part of a wire end connector embedded in the cup.

8. BOWLIN looked at the Vanguard Wash Max and noticed one of the wire end connectors were missing. BOWLIN and MORGAN returned to the University Center and found the missing connector directly underneath where the Vanguard Wash Max was sitting but part of the metal piece was removed. This metal piece appeared to be embedded in the cup of the hoax device.

9. On April 26, 2007, Detectives BOWLIN and GLADD met with an employee of Sodexo named William Scott Kramer (KRAMER). KRAMER was read his constitutional rights, signed a waiver of his rights and was willing to make a statement.

10. KRAMER admitted to writing and placing the note and the hoax device at the University Center cafeteria near the trash cans. KRAMER advised he was stupid and for some reason wanted to know how far he could go.

Based on the foregoing information, the undersigned prays that this Honorable Court issue a Complaint and Arrest Warrant finding that probable cause exists to believe

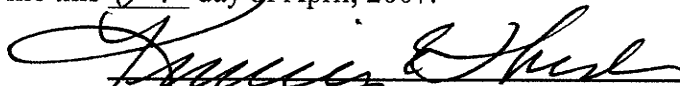
that **William Scott KRAMER** has committed a violation of Title 18, United States Code, Section 1038(a)(1) – False Information and Hoaxes.

FURTHER THE AFFIANT SAITH NOT



CARLOS SANDOVAL, Special Agent
ATF

Subscribed and sworn before me this 27th day of April, 2007.



KIMBERLY E. WEST
United States Magistrate Judge